



379 Ronka Road
Worthington, ON
P0M 3H0
(705) 866-1677

LindaH@OntarioRiversAlliance.ca
OntarioRiversAlliance.ca

4 October 2013

Stephanie Hodson
Stakeholder Relations Officer
Xeneca Power Development Inc.
Email: shodsoll@xeneca.com

Dear Ms. Hodson:

Re: Wabagishik Rapids GS Environmental Report

Further to your 27 September 2013 email in which you informed me that, *“Due to the sheer size of all the individual documents in the Annexes, OEL’s admin staff printed each report separately, then scanned the entire annex into one or more PDFs. This was to keep each file to a reasonable size (for example, had we merged all the original PDFs into one large, high-quality file, Annex I would probably have been almost 1 GB in size.) Therefore, in the Annexes, one cannot “search” or “copy.”* I will remind you that in our 16 November 2012 meeting with Uwe Roeper and Mark Holmes, their Meeting Notes stated, *“MH reconfirmed Xeneca’s commitment to provide ORA with a copy of the ER with as much advance notice as possible, and that Xeneca will also provide “unlocked” documents which will better enable ORA to review and assess the documents.”*¹ This promise has not been kept – all documents were secured.

The search and copy functions are enabled on the ER, but it cannot be highlighted, and none of the Annexes or Appendices can be searched, copied or highlighted. It is a very simple process to combine several pdf documents into one, so there is no reason why OEL, who I assume are professionals, could not have done that. The size of the document is also easily reduced. Scanning documents takes a picture of them - hence the large files, and the inability to properly work with them. The way you have offered these documents makes it very slow and cumbersome to review the ER. The responsibility is with Xeneca to ensure their promise was kept, and documents were user friendly for the public.

I request that all Annexes and the ER be made available immediately for download in a form that is unlocked, and can be searched, highlighted, copied, and pasted – as both Mark Holmes and Uwe Roeper agreed.

In these same Meeting Notes it was noted, *“MH asked if LH had received Xeneca’s September 2012 letter responding to questions on siltation and sediment concerns. Responding affirmatively, LH said it was a thorough answer. LH also noted that recent correspondence sent to Al Hepburn regarding concerns over the Big Eddy Project in Pembroke had been received. She also noted Mr. Hepburn had complemented the thoroughness of the response.”* These comments that were purported to have come from me did not, and I would have never referred

¹ Wabagishik Rapids GS ER – Appendix D, Part 2, P232 – 16 November 2012 Meeting Notes written by Xeneca.

to Xeneca's response as being "thorough" because I have never witnessed a thorough report from Xeneca yet – in fact I remember referring to Al Hepburn as being very thorough. I will also note that those Meeting Notes were never forwarded to Jim Rook or me for review or approval. This graphically illustrates the fact that meetings with Xeneca representatives must be avoided.

Xeneca is also very selective about what is included in the ER – for instance:

- None of the Minutes of the Vermilion Stakeholder Advisory Committee (VSAC) which Xeneca established were included. Why?
- Neither my letter of resignation from VSAC, dated 10 July 2012 (attached), nor my 25 July 2012 follow-up letter (attached), were included in the ER. Why?
- None of the three municipalities that passed motions to reject the Vermilion River hydroelectric proposals were included in the ER. Why?
- Appendix D-Part 1 – Public Communication Logs – the purpose of a log is to record events as they occur. Xeneca should be clear that your responses to questions and concerns in this document do not reflect how you attempted to address their concerns at the time, but are current responses designed to inform the public at the time of ER submission. Most of your "Responses" are not relevant to what actually occurred at the time of the event, but actually make it appear as though you gave thoughtful and informative answers to citizens' concerns. This raises the question again of what else has been left out of the ER documents. How can we rely on the ER to contain accurate and complete information?
- On page 27 of this document, you will note on several occasions where documentation was requested by Vermilion River Stewardship (VRS), but not one of your responses reflected the fact that we made a Freedom of Information Application to the Ministry of Natural Resources (MNR), and our application was approved by MNR, but that Xeneca appealed the decision and stopped VRS from receiving the documentation.
- *"MH observed that tenured university professors from Laurentian University have supported the view that Xeneca's proposed projects would not worsen the algae problem in the river, and, with some design or operational programs, could possibly help improve the situation".² Please produce the supporting study or documentation for this statement. One of those same tenured university professors you speak of was on the Stakeholders Advisory Committee and at the same time actively pursuing "research partnerships/synergies on some of our waterpower projects"³.*

This is exactly why trust and confidence have been, and continue to be, eroded. If we can't trust Xeneca to represent the facts accurately, do as they have promised, and conveniently leave important documentation out of the ER, then how can we trust Xeneca to build a hydroelectric facility that has the potential to severely impact on public health and safety, endangered species, and the Vermilion River ecosystem?

I look forward to your prompt response!

Respectfully,



Linda Heron
Chair, Ontario Rivers Alliance
Chair, Vermilion River Stewardship

² Wabagishik Rapids GS ER – Appendix D, Part 2, P232 – 16 November 2012 Meeting Notes

³ Wabagishik Log – August 2012 – Draft ER, P13.

Attachments (2)

Cc: Honourable Jim Bradley, Minister of Environment – minister.moe@ontario.ca
Ellen Cramn, Environmental Planner/EA Coordinator - ellen.cramn@ontario.ca
Paul Norris, Ontario Waterpower Association - pnorris@owa.ca